

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

FILED- LN

June 23, 2025 8:55 AM

CLERK OF COURT

U.S. DISTRICT COURT

WESTERN DISTRICT OF MICHIGAN

BY: eod scanned by: eod / 6/23

UNITED STATES DISTRICT COURT

for the

Western District of Michigan

____ Division

MACUS M. BRIM

Case No. _____

(to be

1:25-cv-684**Ray Kent****U.S. Magistrate Judge***Plaintiff(s)**(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

-v-

ASHLEY SMITH, MDOC

*Defendant(s)**(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)***COMPLAINT FOR VIOLATION OF CIVIL RIGHTS**

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	ASHELY SMITH		
Address	DEPARTMENT OF CORRECTIONS INGHAM PRLE OFFICE 534		
	LANSING	MI	48913
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	INGHAM		
Telephone Number	517 284-7662		
E-Mail Address			

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	MDOC		
Job or Title <i>(if known)</i>			
Address			
	LANSING	MI	48913
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number			
E-Mail Address <i>(if known)</i>			
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

Defendant No. 2

Name			
Job or Title <i>(if known)</i>			
Address			
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number			
E-Mail Address <i>(if known)</i>			
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Defendant No. 3

Name _____

Job or Title *(if known)* _____

Address _____

City _____

State _____

Zip Code _____

County _____

Telephone Number _____

E-Mail Address *(if known)* _____☐ Individual capacity ☐ Official capacity

Defendant No. 4

Name _____

Job or Title *(if known)* _____

Address _____

City _____

State _____

Zip Code _____

County _____

Telephone Number _____

E-Mail Address *(if known)* _____☐ Individual capacity ☐ Official capacity**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against *(check all that apply)*:☐ Federal officials (a *Bivens* claim)☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?
 FAILED TO PROTECT, 8 A MENDMENT, CRUEL AND UNUSUAL, FALSE IMPRISONMENT DUE
 PROCESS VIOLATION, 14 AMENDMENT,

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
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III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

I WAS PUT IN WITNESS PROTECT PROGARM AND WHEN SENT THE SAME PEOEOPLE I TOLD ON SET ME UP AND I WAS SENT BACK TO PRISON AND I WAS ASSAULTED. DOING THIS TIME I WAS DEAL MY DUE PROCESS I WAS NOT NOT GIVEN NOTICE TO A MISCONDUCT THAT WAS DISMISSED AND WAS WROTE MISCONDUCT AND THEY MADE IT THAT I WOULD UN ALBE TO APPEAL THE MISCONDUCT. I WAS HIT IN THE HEAD AND HAD TO HAVE BRAIN SURGERY PLANIFF WAS WAS CALLED TO A MEET 2 TIMES BY MDOC OFFICER TO A CHURCH HIS NAME IS RICKYL. BRADLEY, ASHLEY SMITH KNEW THAT THE PLAINTIFF TOLD ON THE SAME PEOPLE WHO HAD HIM LOCKED UP THEN SHE DON'T TELL THE MDOC HE WAS IN WITNESS PROTECT PROGARM.

- B. What date and approximate time did the events giving rise to your claim(s) occur?
AUGUST 8 PLANIFFI WAS PUT ON PAROLE, IN JULY 2023 THE PLAINTIFF WAS ASSAULTED BY MEMBER OF HIS FAMILY DANA DESEAN JOHSON, SND HIS BROTHER DENONTS MONTIZE EVANS.
-

- C. What are the facts underlying your claim(s)? (For example: *What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)

1. ON AUGUST 8, 2023 PLINTIFF WAS PUT ON PAROLE IN CALHOUN COUNTY.

2. IN JULY 2023 PLAINTIFF WS ASSAULTED BY MEMBER OF HIS FAMILY DANA DESEAN JOHNSON, AND DEONTA MONTIZE EVANS WITH A GUN WHO ALSO WAS GDS GANG MEMBERS THAT SAME DAY PLAINTIFF WAS PT INTO WITNESS PROTECTIVE PROGARM FOR HIS HOME AND MOVED TO KALAMAZOO, MI SEE EXHIBIT 1-7

3. OM OR BOUT AUGUST 7, OR ABOUT PLAINTIFF WAS MOVED TO INGHAM COUNTY, LANSING MI WHY HE WAS STILL IN WITNESS PROTECT PROGARM.

4. PLAINTIFF WAS SUMMONED TO BATTLE CREEK BY HIS MOTHERS PASTOR PASTER RICKY L. BRADLY TOLD HIIM HE KNEW WHERE HE WAS AND ALSO TOLD HIM WHO HIS PAROLE OFFIER WA NOT ONE TIME BUT TWO TIMES

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

1. ON AUGUST 8, 2023 PLINTIFF WAS PUT ON PAROLE IN CALHOUN COUNTY.

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3. OM OR BOUT AUGUST 7, OR ABOUT PLAINTIFF WAS MOVED TO INGHAM COUNTY, LANSING MI WHY HE WAS STILL IN WITNESS PROTECT PROGARM.

4. PLAINTIFF WAS SUMMONED TO BATTLE CREEK BY HIS MOTHERS PASTOR PASTER RICKY L. BRADLY TOLD HIIM HE KNEW WHERE HE WAS AND ALSO TOLD HIM WHO HIS PAROLE OFFIER WA NOT ONE TIME BUT TWO TIMES

4. ON 9/27/2023 AND A NUMBERS OF DATES PLAINIFF TESTIFY ON DEONTA EVANS, AND DANA JOHSON, AAND DOING THIS TIME ALSO HIS STEP-DAUGHTER CHID FATHER CARL AMERSON ALL 3 DEFENDAS WAS COVICTED 2 ON JUNE 17, 2024 CALHOUN JUSTICE CENTER IN BATTLE CREEK MI OF ASSAULT WITH A DANGEROUS WEAPON OF ASSAULT DOIN THIS TIME THE PLAINTIFF WAS BEING TREATEN BY CARL AMERSSON WHO IS THE PLAINTIFFS STEP DAUGHTRTS BOYFRIEND.

5. ON 4/13/2024 PLAINTIFF STEP DUGHER DEBREA MICKLATHER MICKLATHER CAME TO PLAINTIFFS HOME TO GET HER 3 KIDS AT THIS TIME THEY HAD WORDS THE PLAINTIFF AND HER BOTH CALLED THE POLICE SHE TOLD THEM THE PLAINTIFF HAD A BOX CUTER ALL WITNESSES SAID THE PLAINTIFF DON'T HAVE ANYTHING IN FACT THE PLAINTIF WIFE SAID HE THE PLAINTIFF DON'T HAVE ANYTHING THIS PERSON WAS HER MOTHER.

6. ON 4/13/2024 THE PLAINTIFF CALLED PAROLE AGENT ASHLEY SMITH, SHE DON'T ANSWER THE PHONE SO THE PLAINTIFF LEFT A MESSAGE TELLING HER (HE AVISISED HIS WIFES DAUGHTER SHOWED UP AND HREATENING HIM AND YELLIING AT HIM OUTSIDE HE CALLED LANSING POLIC AGAINST HER BOYFRIEND HE SAID SHE MAD HE TESTIFIED

AGAINST HER BOYFRIEND IN COURT ABOUT A CASE. HE SAID HIS WIFE TOINA BRIM WAS ABLE TO GET HER TO LEAVE BEFORE THE POLICE GOT THERE. THE POLICE CAME AND SAID ALL THE WITNESSES SAID THE PLAINTIFF DID NOT DO ANYTHING. SEE EXHIBIT 2-3

7. THE NEXT DAY THE PLAINTIFF HAD A HEART ATTACK AND LOST HIS MEMORY. HE STAYED IN THE HOSPITAL UNTIL APRIL 19, 2024 HE WENT TO SEE THE DEFENDANT BUT SHE WAS NOT THERE HE WAS MET BY SOME OTHER PERSON HE WAS THEN ARRESTED BY (ARU) WITHOUT INCIDENT THE INGHAM COUNTY JAIL WOULD NOT TAKE HIM, DUE TO HIS MEDICAL NEEDS PER (PVS) PLAINTIFF WAS TRANSPORTED TO RGC PRISON BY ARU ON THE WAY TO PRISON HIS STEP DAUGHTER WAS SENDING EMAILS TO HIS WIFE SAYING YOU;S CALLED CPS ON ME BELITTLED ME THAT EVERYONE LIED TO PEOPLE ABOUT ME SAYING ACTING LIKE I STOLE MONEY FOR MONTHS THAT I NEVER STOLE YOUVE REALLY BEEN A REAL PIECE OF SHIT FOR THE LAST COUPLE OF YOURS. YOU SHOULD BE PROUD OF YOURSELF LOOK AT YOUR HUSBAND ARE YOU HAPPY JUST AS FAST AS YOU GOT HIM YOU LOST HIM NOW YOU CAN BE LOOKING LIKE ME JUST AS SAD AS IVE BEEN WITH NOBODY AROUND YOU JUST LIKE ME. SHE SENT THIS TO THE PLAINTIFF WIFE THEN HIS WIFE SENT IT TO HIM SO THE PLAINTIFF THEN SENT IT TO HIS FATHER GEORGE SMITH ON APRIL 19, 2024 WHEN THE PLAINTIFF GOT TO RGC PRISON HE HAD A HEART ATTACK AND THEY TOOK HIM TO THE PRISON HOSPITAL THEN AFTER THEY PUT HIM INTO GENERAL POPULATION PLAINTIFF WAS THEN SENT TO HIS CELL IN A WHEELCHAIR HE WAS NOT FEELING GOOD SO HE PUSHED HISSELF TO THE OFFICERS TOLD THEM HE WAS NOT FEELING WELL THE LADY OFFICER WITH EYEGLASSES CALLED HEALTH CARE THEY TOLD HER THEY SEEN HIM AND THEY WAS DOING NO MORE. PLAINTIFF WAS FINE THEN THE PLAINTIFF WENT TO HIS CELL WENT TO THE BATHROOM AND FOUND OUT WHEN HE CAME TO HIS BUNKY AND THE HOLD UNIT WAS CALLING FOR HELP THEY CAME AND GOT THE PLAINTIFF TOOK HIM TO THE PRISON HOSPITAL AGAIN THIS TIME HE HAD TO TELL THEM TO READ HIS PAPER WORK SO THEY DID SO HE THEN WAS ADMITTED TO THE PRISON HOSPITAL WAS ASKED IF HE NEEDED AID HE SAID YES BUT ONE WAS NEVER GIVEN TO HIM.

8. ON 4-19-2024 PLAINTIFF WROTE A GRIEVANCE THE GRIEVANCE WAS REJECTED THEY SAID HE FAILS TO LIST STAFF IN RESOLUTION ATTEMPT. SEE EXHIBIT 3

9. PLAINTIFF WAS MOVED TO 2-NB-58L.

10. ON A UNKNOWN PLAINTIFF WAS IN THE EATING HALL ON THE RIGHT SIDE WHEN SOME ONE WAS CALLING HIS NAME AT THAT TIME HE LOOKED AND SEEN IT WAS DEONTA EVANS THE SAME PERSON THE PLAINTIFF TESTIFIED ON. AT THIS TIME HE STARTED TO WALK TOWARDS THE PLAINTIFF AND STOPPED AND SAID WHATS UP NOW SO THE PLAINTIFF PUSHED HIS WHEELCHAIR BACK HE THEN TOLD THE PLAINTIFF ILL BE SEEING YOU SOON SO THE PLAINTIFF THEN PUSHED HIMSELF OUT THE EATING HALL AND WENT TO HIS UNIT TRIED TO TELL THE OFFICERS THEY TOLD HIM TO LOCK HIS RAT ASS DOWN AND THE PLAINTIFF WENT TO HIS CELL. 11. ON A UNKNOWN DAY THE PLAINTIFF WAS AGAIN IN THE EATING HALL THIS TIME ON THE LEFT SIDE THEN SOME ONE WAS CALLING HIS NAME SO HE LOOKED HIM AND SEEN THIS PERSON FROM BATTLE CREEK JESSIE MCCABER THIS PERSON THEN CAME OVER AND WAS TWO TABLES OR SO HE THEN CALLED THE PLAINTIFF A RT AND THEY WAS GOING TO DEAL WITH HIM PLAINTIFF WAS IN FEAR SHE HIS PUSHER PUSHED HIM TO GET HIS MEDS THEN TO HIS UNIT QN AND CELL PLAINTIFF WAS IN FEAR OF HIS LIFE SO HE WENT TO HIS CELL AND DONT COME OUT.

12. ON 5-1-2024 PLAINTIFF GOT A PAS TO HIS CLINICAL PSYCHOLOGIST AND HE WENT AND TOLD HER WHAT HAPPEN SHE THEN CALLED SOME ONE SHE THEN TOLD ME DONT WORRY YOU SAFE NOW SO THE OFFICER CAME AND IMPULSED ME TO CELL THE SPECIAL MANAGEMENT HOUSING UNIT SHHU WHEN HE GOT THERE SGT GROSS CAME TO THE CELL AND AID O YOU ONE OF THEM HUH, THE PLAINTIFF ASKED HIM WHAT THAT MEAN HE THEN SAID NOTHING. HE THEN HAD THE PLAINTIFF SIGN A FORM THE INVESTIGATION REPORT SEE EXHIBIT 4.

12. ON A UNKNOWN DAY PLAINTIFF WAS CALLED OUT BY S.C.C AND TOLD THEY KNOW AND WOULD BE DOING SOMETHING.

13. ON A UNKNOWN DAY PLAINTIFF CAME OUT CELL TO USE THE PHONE TO CALL HIS WIFE TONIA BRIM HE TOLD HER WHAT WAS GOING ON AT THIS TIME PEOPLE WAS STARTING TO COME OUT THE PLAINTIFF WAS IN FEAR OF HIS LIFE HE THEN TOLD THE COS HE WAS ON PC THEY CANT BE OUT WITH HIM THEN TOLD HIM HE WOULD BE FINE SH HE ASKED TO GO BACK TO HIS CELL.

14. ON A UNKNOWN OTHER GANGS MEMBER IN THE UNIT WAS CALLING OUT WHERE IS THAT BROTHER WHO TOLD ON THE BROTHERS HE IN A WHEELCHAIR SO AT THAT TIME A

BLACK NIGEVIAN OFFICER WALKED BY AND YELLED HE SAID HE LOCKED IN THIS CELL AT THAT TIME THEM PRISONS WAS SARTING TO CALL ME BUT I DON'T ANSWER.

15. ON A NOTHER DAY THIS SAME NIGERIN OFFICE OR AFRICAN CAM TO HIS CELL THE PLAINTIFE AND TOLD HIM HE HAD TO MOVE UP STAIRS. THE PLAINTIFF TOLD HIM HE HAD SEILURS SO HE COULD NOT GO UP THERE AND BEFORE HE BECAUE HE WAS IN A WHEELCHAIR SO THE OFFICIE WEN CALLEDLD HIM HE DON'T HAVE TO MOVE.

16. ON 5/23/2024 THIS SAME OFFICER CAME TO HIS CELL AND TOLD HIME HE NEEDED TO GO UPSTAIRS AGAIN. THEN THE PLAINTIFF TOLD HIM WHY HE COULD NOT MOVE, SO HE WENT TO THEM AND THE OFFICER HE HAD TO MOVE. SO THE PLAINTIFF ASKED THE SARGENT AT THAT TIME HE TOLD THE PLAINTIFF IF HE DONT MOVE HE WILL GET A MISCONDUCT TICKET, SO HE WALKED AWAY AND THE SARGENT CAME TO TALK TO HIM. THE PAINTIFF TOLD HIM THE SAME PEOPLE HE GOT INTO IT WITH ARE UPSTAIRS, THEN THE SARGENT ASKED HIM WHY HE COULDN'T MOVE. THE PLAINTIFF TOLD THE SARGENT THAT HE WAS IN A WHEELCHAIR AND HAS SEISURES SO WAS NOT ABLE TO GO UPSTAIRS DUE TO THAT. THE PLAINTIFF SAID THAT IF HE HAD TO GO UPSTAIRS THEN HE WOULD KILL HIMSELF. SO AT THAT TIME THE SARGENT TO HIS WALKER AND PLACED THE PLAINTIFF IN HIS WHEELCHAIR AND TOOK HIM TO SUICIDE WATCH. THAT SAME NIGT THE PLAINTIFF RECIEVED A MISCONDUCT TICKET (D.D.O) EXHIBIT 5.

17. ON 5/24/2024 HID PSYCHOLAGIST CAME TO HIS CELL AND ASKED HIM WHAT HAPPEN PLAINTIFF THEN TOLD HER WHAT HAPPEN. SHE THEN STATED SHE WOULD GO TO THE DEPUTY WARDEN ABOUT THIS ISSUE. THE DEPUTY WARDEN SAID HE WOULD THROW THE MISCONDUCT OUT. THIS DIDNT HAPPENED.

18. ON 05/24/2024 UNKNOWN FEMALE OFFICER CAME TO PALITIFF CELL AND TOOK HIM BACK TO SEG. SO THIS TIME THEY TRIED TO PUT HIM BACK UPSTAIRS, SO THE PLAINTIFF GOT OUT OF HIS WHEELCHAIR STARED TO GO UP THE STAIRS AND TRIED TO JUMP OFF THE GALLERY. THUS UNKNOWN OFFICER INDENTFIED AS OFFICER SKINNER, AND SARGENT OFFICER GROSS TOO CONTROL OF THE PLAINTIFF PLAVED HIM IN CHAINS AND TOO HIM TO THE SAME SUCIDE WATCH CELL. THAT NIGHT SARGENT GROSS CAME TO PLAINTIF CELL WITH THE SAME (D.D.O) AND ASKED WILL YOU PLEAD GUILTY OR NOT. PLAINTIFF THEN TOLD HIM HIS REASON TO NOT BE FOUND GUILTY. THE SARGENT

WALKED AWAY AND NEVER CAME BACK. 1 HOUR LATER THEY TOLD THE PLAINTIFF HE WAS GOING TO THE MENTAL HOSPITAL, SEE EXHIBIT 6.

19. THE PLAINTIFF WAS THEN AT THE MENTAL HOSPITAL WHERE HE RECEIVED A COPY OF THE D.D.O MISCONDUCT HE WAS FOUND GUILTY AND GIVEN 15 DAYS L.O.P THE PLAINTIFF WAS GIVEN REASONABLE TIME TO APPEAL THIS MISCONDUCT. ALSO BECAUSE HE WAS NOT ALLOWED TO HAVE ANY PEN OR PAPER, SEE EXHIBIT 7.

20. ON UNKNOWN DATE PLAINTIFF WAS MOVED TO ANOTHER FACILITY.

21. ON 07/13/2024 THE PLAINTIFF WAS IN THE DAY ROOM UNIT E, WHEN 3 PRISONERS CAME UP TO HIM AND ASKED IF HIS NAME WAS MARCUS BRIM THEN THE PLAINTIFF SAID YES. THEY THEN SAID YOU TOLD ON BROTHER MANS THAT WAS FROM BATTLE CREEK THE PLAINTIFF THEN SAID NO. THEY THEN TOLD THE PLAINTIFF HE HAD TWO OPTIONS, PAY UP OR GET OFF THE YARD. SO PLAINTIFF SAID HE ISNT DOING EITHER ONE, THEN LOOKED TO THE LEFT TO TALK TO SOMEONE THEN STARTED TO TURN BACK AROUND AND GOT PUNCHED IN THE FACE AND WAS KNOCKED OUT. THE PLAINTIFF THEN GOT UP AND WALKED TO THE BATHROOM. AT THIS TIME TWO OF THE SAME PRISONERS CAME TO THE BATHROOM TO CONFRONT HIM AND TOLD HIM HE HAD TO GO, SO PLAINTIFF WENT TO THE DAY ROOM AND SAID HE ISNT GETTING OFF THE YARD. THE PLAINTIFF WAS THEN HIT IN THE HEAD WITH A CHAIR, HE WAS THEN KNOCKED OUT AND UNCONCIOUS AND WOKE UP AND HAD A SEIZURE. HE HAD PAIN IN HIS SHOULDER AND THE NURSE PUT HIS ARM BACK IN PLACE THEN PUT HIS ARM IN A SLING. A FEMALE NURSE THEN CAME TO HIM AND SHE WAS TOLD TO PUT A NECK BRACE ON HIS NECK SHE SAID SHE SAID SHE DONT KNOW HOW TO. SHE THEN PUT THE NECK BRACE ON THE PLAINTIFF AND HE INSTANTLY STARTED SCREAMING IN PAIN THEN PASSED OUT AND WOKE UP IN THE HOSPITAL YELLING SAYING HIS NECK HURT. AT THAT TIME THE NURSE SAID "HOLY SHIT THIS THING IS ON BACKWARDS". AT THIS TIME THEY STOPPED FENTANYL IN HIS IV FOR THE PAIN AND HE STARTED TO GO CRAZY , SO THEY GAVE A SHOT TO COUNTERACT THE FENTANYL. THEY THEN TOLD THE PLAINTIFF THEY CAN NOT HELP HIM AT THIS HOSPITAL IF HE WAS NOT MOVED HE COULD DIE . HE WAS THEN TRANSFERRED TO A HOSPITAL IN JACKSON MICHIGAN WHERE HE RECEIVED 19 STAPLED ONE STITCH AND A DRAIN TUBE. THE PLAINTIFF THEN HAD A SEIZURE IN THE HOSPITAL. THEN WAS RELEASED THAT THURSDAY.

22. THE PLAINTIFF WAS THEN TRANSFERRED TO THE PRISON MAIN HOSPITAL, WHEN HE GOT THERE IMMEDIATELY HAD PROBLEMS. HE WENT INTO VERTIGO HE WAS THEN IMMEDIATELY TAKEN TO THE ER IN THE PRISON. HE WAS THEN TOLD HE WAS GONNA BE ADMITTED TON THE FOURTH FLOOR. HE WAS ASKED IF HE NEEDED A PRISON AID THE PLAINTIFF SAID YES HE WAS THEN MOVED TO THE FOURTH FLOOR, WHEN HE GOT THERE HE WAS PLACED IN THE ROOM. THEY CAME BACK TO THE ROOM AND ASKED IF YOU TRIED TO KILL HIS SELF. THE PLAINTIFF SAID NO THEY LEFT AND CAME BACK FIVE MINUTES LATER AND TOLD THE PLAINTIFF HE HAD TO GO TO SUICIDE WATCH ACROSS THE HALL AND SLEEP ON THE FLOOR. THE FEMALE NURSE THEN TOLD THEM THAT SHE IS NOT PUTTING HIM ON THE FLOOR IT WAS AGAINST HOSPITAL POLICY BECAUSE HE JUST HAD BRAIN SURGERY, THEN WAS MOVED TO CELL 452. THEY TOLD THE PLAINTIFF TO KEEP ALL HIS CLOTHES AND LEFT.

23. THEN NEXT DAY THE PLAINTIFF WOKE UP TO THE DOCTOR AND THE PSYCH DOCTOR WHY HE WAS ON SUICIDE WATCH. THE PLAINTIFF RESPONDED SAYING HE DIDNT KNOW. THE PSYCH SAID THERE WAS NO RECORD OF WHY HE WAS ON SUICIDE WATCH. SO HE WAS THEN MOVED FROM SUICIDE WATCH WITHIN MINUTES.

24. THAT SAME DAY THE PLAINTIFF ASKED FOR A GRIEVANCE HE WAS TOLD HE HAD A AID WORKER TO WRITE A GRIEVANCE FOR HIM. IT WAS NEVER DONE.

25. THAT NEXT DAY FRIDAY, THE PLAINTIFF ASKED FOR A GRIEVANCE AND A SHOWER, WAS THEN TOLD HE HAD TO WAIT FOR HIS AID WHICH NEVER CAME. SO THEN THE PLAINTIFF ASKED FOR A PHONE CALL TO CALL HIS WIFE AND THEY GRANTED IT.

26. THAT MONDAY MORNING EARLY MORNING THEY LET HIM SHOWER. HE WAS TAKEN BY A NURSE AND OFFICER IN HIS WHEELCHAIR. WHEN HE GOT THERE HE WAS TOLD TO SHOWER AND HE TOLD THEM HE COULDN'T BECAUSE HIS ARM WAS MESSED UP. SHE THEN TOOK THE PLAINTIFF OUT OF THE WHEEL CHAIR AND PUT HIM ON THE BLUE SHOWERING TABLE AND SHOWERED HIM. AFTER HIS SHOWER HE WAS WHEELED BACK TO HIS CELL AND ON THE WAY THERE HE ASKED FOR A GRIEVANCE AGAIN. HE WAS TOLD HE NEEDED HIS AID FOR THAT, HE THEN ASKED TO CALL HIS WIFE AND WAS GRANTED THAT PHONE CALL. HE REPEATED ASKING FOR A GRIEVANCE AND DENIED HIS RIGHT.

27. SOMEONE FROM THE PRISON THAT PAROLE BOARD WANTED TO SEE HIM.

28. THE NEXT DAY AROUND 2AM A PAPER WAS SLID UNDER HIS CELL DOOR. HE WENT AND GOT THE PAPER TO FIND OUT IT WAS A MISCONDUCT FOR FIGHTING AND POSSESSING A WEAPON. IN THAT REPORT ALL CHARGES WERE DISMISSED DUE TO DUE PROCESS. BECAUSE THE PLAINTIFF WAS NEVER REVIEWED ON THE MISCONDUCT SO IT WAS THROWN OUT DUE PROCESS VIOLATION, ALSO CAUSE THE CONDUCT WAS NEVER GIVEN TO HIS PSYCH TO SEE IF HE COMPATIBLE TO STAND TRIAL. WHILE HE WAS IN THE HOSPITAL HE WAS SENT TO AN OUTSIDE DOCTOR TO GET HIS STAPLES REMOVED.

29. THE PLAINTIFF WAS THEN TRANSFERRED TO A LEVEL 4 PRISON.

30. ON AN UNKNOWN DATE PLAINTIFF WENT TO TALK TO PSYCH TO ASK WHY HE WAS THERE. SHE SAID TO KEEP HIM SAFE BECAUSE HE WAS IN THE CARE OF R.T.P.

31. AFTER DOING HIS TIME OTHERS STARTED MESSING WITH HIM. ASKING HIM IF HE TOLD ON PEOPLE FROM BATTLE CREEK HE THEN SAID NO. HE WENT TO HIS PC AND TOLD THEM WHAT WAS GOING ON. ALL HE SAID WAS IF NO ONE WAS THREATENING HIM THERE WAS NOTHING HE COULD DO ABOUT IT. THE PLAINTIFF THEN ASKED FOR PROTECTION AND WAS DENIED HIS RIGHT. SO HE CALLED HIS WIFE AND TOLD HER WHAT WAS GOING ON.

32. PLAINTIFF WENT TO TALK TO HIS PSYCH MILLER HE THEN SHOWED HER A COPY OF HIS REQUEST OF PROTECTION. THAT WAS DONE ON 05/01/2024. SHE THEN CALLED THE PC AND SENT HIM A EMAIL, TELLING HIM SHE HAD NO PROBLEM LETTING HIM OUT OF RTP TO SEND HIM TO THE PROTECTIVE UNIT.

33. ON AN UNKNOWN DATE HE WAS CALLED OUT BY HIS PC AND WAS YELLED AT FOR THE EMAIL THAT HIS PSYCH SENT TO HIM.

34. ON 10/18/2024 THE PLAINTIFF CALLED HIS WIFE AND SHE HAD DETECTIVE TYLER SOUTHLAND WITH THE BATTLE CREEK POLICE DEPARTMENT PLAINTIFF TOLD HIM WHAT HAPPEN. AT THAT TIME THE DETECTIVE HE WOULD GET HIM OUT AFTER HE TALKED TO THE WARDEN.

35. ON 10/21/2024 PLAINTIFF GOT PAPER FROM THE PAROLE BOARD TO SEE HIM DURING THE NEXT FEW MONTHS THE PLAINTIFF GOT X RAYS ON HIS RIGHT ARM.

36. 12/10/2024 PLAINTIFF GOT HIS PAROLE AND RELEASED ON APRIL 22, 2025.

37. ON AN UNKNOWN DATE SOMEONE SHOT UP PLAINTIFF WIFE HOUSE POLICE CAME AND TOLD HER TO CALL BATTLE CREEK POLICE DEPARTMENT AND TALK TO DETECTIVE SOUTHLAND. HE TOLD HER TO CALL THE PRISON AND TOLD HER THERE WAS NOTHING THEY COULD DO.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Plaintiff had brain surgery and lost of feeling in his left side when me look down his body go numb. His right shoulder arm has a torn bicycle and a torn cup it took them 9 months to do x-rays on his arm.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Plaintiff is asking this court for a preliminary injunction to get his prole switched from the state to the federal prole do to the reason in his complaint motion for preliminary injunction. Plaintiff is asking for money damages and punitive damages in to amount 20 million Plaintiff had to have Brain Surgery now he have no feeling in hiis left side most of the time.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

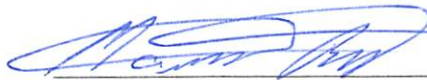
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

6-23-2025

Signature of Plaintiff



Printed Name of Plaintiff

MACUS M. BRIM**B. For Attorneys**

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

City

State

Zip Code

Telephone Number

517-626-4777

E-mail Address

brimmacus89@gmail.com